

## Audit of Election Commission Absentee Ballot Processing

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City Comptroller
City of Milwaukee, Wisconsin

October 2008

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Office of the Comptroller

October 14, 2008

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To the Honorable the Common Council City of Milwaukee

Dear Council Members:

The attached report summarizes the results of our Audit of Election Commission Absentee Ballot Processing.

The Election Commission has made significant improvements in the processing of absentee ballots, including centralized processing of the ballots on Election Day and full utilization of the Statewide Voter Registration System. The audit makes eight recommendations to further enhance controls and procedures.

Audit results are discussed in the Audit Conclusions Recommendations section of the report, which is followed by the response from the Election Commission.

Appreciation is expressed to the Election Commission for the full cooperation extended to the auditors.

Sincerely,

W. MARTIN MORICS

Comptroller



#### I. Scope and Objectives

The audit covered the Election Commission's preparation for, and execution of, absentee ballot processing for the April 1, 2008 election. The audit evaluated the Election Commission's compliance with its newly written and implemented Standardized Operating Procedures (SOPs), which encompass City ordinances related to absentee ballot election procedures as well as rules, regulations and procedures mandated by Wisconsin Statute 7.52 and associated Administrative Rules.

The audit was limited to absentee ballot processing only and did not cover any other aspects of the April election.

The objectives of the audit were to:

- > Evaluate the efficiency and effectiveness of the recently implemented centralized absentee ballot processing.
- Review the control procedures, including the use of the newly implemented Statewide Voter Registration System (SVRS) for handling absentee ballots from the time an absentee ballot request is received until the absentee ballot is processed.
- Evaluate the absentee voting procedures for compliance with the newly implemented SOPs, City ordinances, and State Statutes, including internal controls and integrity checks.
- > Describe the resources and methods used by the Election Commission to process requests for absentee ballots as well as to fulfill requests for absentee ballots for the April, 1 2008 election.
- > Determine how the Election Commission monitors, processes, and collects absentee ballots at offsite facilities such as assisted living centers.
- ➤ Identify opportunities to improve absentee ballot processing performance and efficiency.

#### II. Background

Prior to the February 19, 2008 election, absentee ballots were opened and processed at the ward polling sites. Voters could return their absentee ballots by mail, submit them in-

person at the Election Commission office in City Hall, or at their assigned polling site on Election Day. Absentee ballots returned by mail or submitted in-person to the Election Commission office were subsequently batched and delivered to the ward polling sites for processing on Election Day. These ballots were sorted by designated polling site and field "runners" would deliver them to the polls on Election Day.

Beginning with the February 19, 2008 election, all absentee ballots are processed at the Election Commission's Central Warehouse located at 1028 North Hawley Road. Absentee ballots returned by mail or submitted in-person at the Election Commission's office are delivered to and processed at this Central Warehouse. Voters who bring an absentee ballot to their polling site on Election Day are provided a new ballot and the absentee ballot is destroyed.

With the implementation of the Federal Help America Vote Act of 2002 and the passage of the 2003 Wisconsin Act 265, the State of Wisconsin implemented the Statewide Voter Registration System (SVRS), which Milwaukee and all other Wisconsin municipalities are now required to utilize. Prior to that time, each municipality maintained its own voter database. The SVRS was used for purposes of this audit to track the processing status of the absentee ballots. The new statewide voter database was first utilized by the City in the September 2006 elections.

Given these significant changes, the Election Commission has developed and implemented new Standard Operating Procedures (SOPs), effective February 1, 2008, outlining the central processing of absentee ballots and compliance with the SVRS, as required by Wisconsin Statute 7.52.

The implementation of new SOPs for central count absentee ballot processing and SVRS compliance has streamlined absentee ballot processing by providing Election Commission staff with a reference guide for handling the ballots throughout the absentee ballot voting process. In addition, the SOPs improve efficiency by outlining absentee ballot processing procedures to be conducted in advance of the election. The pre-election processing of absentee ballots requires Election Commission staff to check ballots for completeness, verify that absentee ballot voters are not ineligible voters, and confirm that all required signatures and authentications are on the outside of the ballot envelope.

These SOPs call for Election Commission staff to date stamp all absentee ballots

delivered by mail or in-person at the reception area of the Election Commission's office in City Hall. Election Commission staff then authenticate each absentee ballot by ensuring that all necessary items are signed and completed, and that the envelope seal has not been broken or tampered with. These steps constitute the authentication process.

Once authenticated, the absentee ballots are turned over to an on-site third party vendor, Heartland Information Systems, Inc., for further processing. The vendor conducts a name search for the voter on the SVRS. Once a voter is verified as registered in the SVRS, or a new registration is entered into the system, the bar-coded label affixed to the outside of the ballot envelope is scanned into the system to log receipt of the ballot.

After the authentication and data entry steps, the absentee ballots are placed in a "holding" bin where they await the next series of pre-election processing to be completed by Election Commission staff, a more comprehensive Department of Corrections felon check and the sorting the absentee ballots by aldermanic district.

Until recently this absentee voter registration data entry was done by Election Commission staff. The decision to utilize a third party vendor was based on the need to ensure all of the voter registration cards would get entered and processed in as expeditious a manner as possible, and to allow the Election Commission staff to concentrate on actual election functions resulting from SVRS implementation. The third party vendor follows a two-step process for each absentee ballot processed: The first data entry step occurs at the time an absentee ballot request is received. Information on the voter requesting the absentee ballot is entered in the SVRS, or for first time voters, information from the voter registration form is entered. The second data entry step occurs when the completed absentee ballot is returned to the Election Commission via mail or in-person. As described above, a SVRS name search is conducted, or data entered for first time voters, and the bar-coded label affixed to the absentee ballot envelope is scanned into the system.

A total of 8,447 absentee ballots were mailed to voters for the April 1, 2008 election. Voters returned 5,417 completed ballots, which were processed at the Central Warehouse. This was comparable to the February 19, 2008 election which had 7,935 absentee ballot requests and 5,979 absentee ballots returned.

#### III. Audit Conclusions and Recommendations

#### A. Summary Conclusions

The audit covered the Election Commission's preparation for and execution of absentee processing for the April 1, 2008 City election. The audit evaluated the Election Commission's compliance with its newly written and implemented Standard Operating Procedures (SOPs). The scope of the audit was limited to absentee ballot voting only and did not cover any other aspects of the April election.

The Election Commission has made significant improvements in the processing of absentee ballots. These improvements include moving the Election Day processing of all absentee ballots from the separate polling sites throughout the City to the Election Commission Central Warehouse. Also, the Election Commission is now fully utilizing the Wisconsin Statewide Voter Registration System (SVRS) for absentee ballot processing. The audit makes eight recommendations to further enhance controls and procedures.

The audit found that the Election Commission's new Standard Operating Procedures (SOPs) for absentee ballots appropriately incorporated the requirements of Wisconsin Statutes, the SVRS and City Ordinances. However, the audit also found several areas where control procedures could be strengthened in the SOPs. The audit recommends that absentee ballots never leave the custody of Election Commission staff, even during data entry by the third-party vendor. The audit recommends improvements to security at the Central Warehouse, additional training for Special Election Deputies, and an evaluation of cost and benefits of outsourcing absentee ballot data entry.

The audit found no errors or improprieties in a sample of absentee ballots from assisted living centers.

#### **B. Centralized Ballot Processing**

Throughout the country, States are moving to centralized absentee voter registration systems, as required by the Federal Help America Vote Act. Many local jurisdictions are also moving to a central absentee ballot processing facility. In following these trends, the

audit found that the Election Commission has done a notable job of implementing the centralized absentee ballot SOPs in conjunction with SVRS compliance. As a new centralized absentee ballot voting facility, absentee ballot voting at the Central Warehouse went very well, particularly since the April 1, 2008 election was the second election with centralized absentee ballot processing. The volume of absentee ballots requested and submitted were comparable to those of the February 19, 2008. Although the Election Commission has done a notable job of implementing the SOPs there are controls and procedures that should be strengthened and improved.

A centralized voter registration system simplifies the absentee ballot process, thereby saving time, eliminating costs and minimizing opportunity for ballot loss and error. As described above, absentee ballots received at the Election Commission offices, by mail or in-person, are immediately entered into the SVRS system, undergo a series of Election Commission compliance audit procedures, and are assigned a bar-coded tracking number. This pre-election absentee ballot processing saves time by allowing absentee ballots to be processed as they are received, rather than in batches as staff time becomes available or all at once prior to election day. Also, the SOPs expedite absentee ballot processing by providing a ready reference for staff should there be questions on handling absentee ballots at any step in the process.

With prior elections, once absentee ballots were separated by aldermanic district, "runners" delivered absentee ballots to their proper polling location on Election Day. Thirty-four runners were hired per election to complete this task. The audit found that the new centralized ballot procedures reduced expenditures by approximately \$7,000 per election. Specifically, prior to the February 19, 2008 election, this task cost the City \$6,728, including wages, vehicle rentals and cell phones. Although cost savings were generated, the primary benefit of having a central processing center for absentee ballots is that it allows the workers at the polling sites to focus their attention on in person registration and voting on Election Day.

Wisconsin Statutes require that the Election Commission send voters their absentee ballots within twenty-four hours of receiving a ballot request. For requests made before ballots are available, the Election Commission is required to mail the ballots within twenty-four hours after the official ballots are received from Milwaukee County.

In conformance with the Calendar of Wisconsin Election and Campaign Events:

November 2007 - December 2008 and Wisconsin Statute 7.10 (3), 7.15(1) (c), the official ballots were provided by Milwaukee County on March 11, 2008, three weeks before the April 1<sup>st</sup> election. With only three weeks for voters to receive and return their absentee ballots, quick turnaround on ballot requests is essential, particularly for overseas voters.

The audit examined the turnaround time for a sample of 378 absentee ballots. Table 1 shows the time from receipt of absentee ballot requests it took for the ballots to be sent out once the Election Commission received them from the County Printer (or date when ballots were first available), excluding the 81 ballots that were not sent because voters had died, relocated out of the City, or similar circumstances.

Table 1: Absentee Ballot Request Turnaround

Turnaround	Ballots	Percent
1 day	240	81%
2 days	3	1%
3 days	35	12%
4-7 days	13	4%
8-15 days	6	2%
<u>-</u>	Total 297	100.0%

As Table 1 illustrates, 81% of the sampled ballot requests were filled within the twenty-four hour statutory requirement. Turnaround times for the remaining 19% were forty-eight hours or more.

The Election Commission indicates that for the November 4, 2008 election, absentee ballots are being made available by the Milwaukee County Clerk at an earlier date and will be mailed to voters four weeks before the election, one week earlier than in previous elections. As absentee ballots are returned by voters, the Election Commission's third party vendor and temporary office assistants will be logging and entering the ballots in the SVRS.

#### Recommendation 1: Ensure absentee ballot request turnaround time follows statutory requirements

The Election Commission should review procedures for absentee ballot data entry and turnaround time to ensure that ballots are sent out in the most expeditious manner possible. The Commission should request that the Milwaukee County Clerk provide the official ballots at the earliest possible date allowed by Wisconsin Statutes. The Commission should mail the absentee ballots as soon as requests are received and ballots

are available, so that the voters have ample time to return the completed ballots.

#### C. Control Procedures

Implementation of a central processing warehouse not only produces efficiencies by eliminating the need for ballots to be run between polling sites to their actual voting site, it also diminishes the potential for allegations of absentee ballot tampering through a tracking system that tracks ballots from the time an initial request is received to the time the absentee ballot is processed.

Although a centralized processing system improves the integrity of the absentee ballot process, the audit identified areas where procedures could be strengthened and improved.

#### Receiving/Processing Requests and Absentee Ballots

The audit found that Election Commission staff at the Election Commission's office followed control procedures set forth by the SOPs and that the SOPs adequately address internal controls regarding absentee ballot processing at the Election Commission's office prior to being transferred to the Central Warehouse facility.

#### Third Part Vendor Data Entry

As previously described, the Election Commission's third party vendor conducts all data entry into the SVRS database for all absentee ballots, from the time a request is made to the time the actual ballot is returned, either by mail or in-person. Data entry by the vendor predominately occurs in the Election Commission offices. However, the audit found that some data entry by the vendor occurred in the B-6 training room of City Hall, without Election Commission staff present. The processing in room B-6 primarily involved the handling of in-person absentee ballot requests as well as returned in-person absentee ballot envelopes that contained voted ballots. The audit found that there was no direct supervision by Election Commission staff over the data entry of the absentee ballot requests or the data entry of the actual in-person absentee ballots envelopes that were in physical control and possession of the third party contractor. This is a significant control deficiency as the third party vendor enters both the request and actual voted ballot information nearly simultaneously into the SVRS. In addition, there was the potential for

the third party vendor or its assignees to take possession of absentee ballots or voter information and leave the premises.

The Election Commission's SOPs do not address internal control requirements regarding work performed by outside contractors. Contractors were used due to the overwhelming task of data entry of elector registration. While the Election Commissioner has not yet determined the need for third party data entry outsourcing into 2009, the SOPs should expand its absentee ballot control procedures to address third party vendor processing issues in the event such third parties are utilized in the future.

#### Recommendation 2: Further control access to absentee ballots

To deter any potential for or allegations of mishandling or misconduct, access to absentee ballots should be limited to Election Commission staff or third party vendors under the direct supervision of Election Commission staff, and only within the offices of the Election Commission, to deter any allegations of mishandling or misconduct.

#### Recommendation 3: Revise SOPs to reflect third-party vendor

The Election Commission should review controls over data entry of absentee ballot information for activities involving the third party vendor and amend the SOPs to reflect the additional controls, including the enhanced ballot access controls in Recommendation 2.

#### Storage and Transfer of Absentee Ballots

One noted control involves the storage of absentee ballots at the Election Commission office. In prior elections, absentee ballots were stored in an unsecured bin until Election Day. Since the ballots were not in locked storage, the potential for ballot tampering existed. The current Election Commissioner took the initiative to obtain a secure locking cabinet to store the absentee ballots as they are being processed. The ballots remain secure in the cabinet until transferred to the Central Warehouse on the evening prior to Election Day.

#### Processing Absentee Ballots at the Central Warehouse Facility

The Election Commission has three assistants to oversee the numerous Special Election Deputies processing the absentee ballots at the Central Warehouse on Election Day. For the most part, all of the workers understood the required processing procedures and as a result absentee ballot processing ran smooth. However, the Special Election Deputies were allowed to "request" their Election Day assignment and the individuals they wanted to work with. During audit observations, it appeared that many of the Special Election Deputies had worked together before. While there are near term advantages to assigning work teams familiar with each other, a periodic rotation of Special Election Deputies through different districts and aldermanic wards would enhance controls and may increase the skill level of workers with less experience and training. This "knowledge transfer" could improve efficiencies on Election Day.

All of the Special Election Deputies at the warehouse had at least one personal bag, backpack, or purse with them near or under their work area. Some workers had multiple bags, many of which were oversized tote bags. Because the ballots are not magnetized and there is no alarm reader at the door of the Central Warehouse, there is the potential that ballots could be removed from the facility without being detected. In addition, the audit noted a lack of general oversight of the Special Election Deputies, which may also result in ballot theft, loss and errors.

#### Recommendation 4: Cross train staff and assign where needed

Special Election Deputies should be rotated to different districts to improve controls, increase the overall capabilities of election workers, and to help balance workload as some districts had a significantly higher number of absentee ballots than others.

#### Recommendation 5: Store personal bags away from ballots

A separate storage facility should be provided for workers to store their personal belongings. There should never be any personal bags, purses, backpacks in any area where absentee ballots are being handled.

#### General Physical Security

For the upcoming November 4, 2008 general election it is expected that there will be many observers at the Central Warehouse on Election Day. The Election Commission should take all necessary steps to plan ahead to accommodate citizens, media and any other parties that may want to publicly view the counting and reading off of the absentee ballots as permitted by State Statute. Adequate space for observers is an issue as there is limited space for on-lookers at the facility.

Also, there are accompanying security issues that should be addressed to limit access to certain areas of the Central Warehouse facility. For instance, the auditor observed that a citizen entered the absentee election facility and was able to make her way to the back tables of the voter processing station before someone met her to find out what she needed.

#### Recommendation 6: Improve Central Warehouse security

Improve physical access security of the Central Warehouse facility to properly accommodate potential observers on Election Day while providing necessary security for Election Commission staff and absentee ballots. Augment the SOPs to include check out procedures at the Central Warehouse and improve security measures to address the potential removal of absentee ballots from the Central Warehouse.

#### D. Statutory and SOP Compliance

The audit found that the Election Commission's absentee ballot procedures were in compliance with the newly implemented SOPs, State Statutes, City ordinances, SVRS standards, and internal controls and integrity checks. Also, Wisconsin Statues were followed during the transition to the SVRS. The audit found that all SOP's were complied with, with exceptions noted below.

#### Election Commission Storage and Processing

The receipt of ballots envelopes and verification of processing procedures, storage, security and integrity of absentee ballots, measures taken to record names of absentee voters onto ward listings were confirmed by audit observation. Absentee ballots

remained sealed until Election Day and they were properly recorded on the EB124 (absentee ballot log), currently being used with the SVRS. The opening and recording of absentee ballots, and verification that absentee ballots had the proper affidavit and witness signatures was performed in accordance with Wisconsin Statute and the SOPs.

The audit found that nearly every control in the SOPs was complied with for absentee ballot processing on April 1, 2008 at the Central Warehouse.

#### Staffing Requirements

Confirmation of mandatory staffing requirements per the SOPs at absentee voting site location on Election Day was performed, per Election Commission mandates. One Central Count Manager, three Election Assistants and two Election Workers per district table were to be assigned to each absentee ballot location. A visual observation and physical count confirmed that this requirement was in fact fulfilled.

#### Compliance Exceptions

The audit found that some of the Special Election Deputies at the Central Warehouse were lacking the necessary knowledge to process absentee ballots effectively.

It appeared that both workers at the District 7 table lacked the necessary knowledge to know what to do with the Prom Pak (voting results memory pack) to get the election machine started in the morning. They finally started their machine nearly 90 minutes after every other district table started and were unable to process a single observed transaction without incident. Both of these workers should have been assigned to more veteran election workers.

#### **Recommendation 7: Train Special Election Deputies**

Special Election Deputies should be given sufficient pre-election training. Workers with little experience should be assigned to work with veteran personnel.

A refresher training course or perhaps a "mock-absentee" election kickoff should be held for two or four hours before Election Day to ensure that election workers are adequately prepared. This training period could be used to answer many of the questions the election workers have and save valuable time on Election Day. There are currently no required training courses for absentee ballot Election Day workers.

#### **E. Outsourced Services**

Data entry is currently outsourced to Heartland Information Systems at a cost of \$16.86 per hour for regular data entry, \$19.60 per hour for lead data entry, \$55.00 per hour for consultant fees, and \$75.00 per hour for senior consultant fees. This vendor provides data entry services for all voter registrations, not just for absentee ballots. This particular vendor was selected due to the skill level and familiarity with the SVRS system. From January 1, 2008 through March 31, 2008 the cost of all vendor services is itemized as follows:

- > Data Entry \$ 41,021.43
- Lead Data Entry \$7,188.30
- > Consultant \$16,390.00
- ➤ Lead Consultant \$ 7,950.00

As it stands, it is uncertain whether the current outsourced data entry arrangement will continue or whether this was a short term solution to assist the Election Commission in getting all of the voter registration cards entered into the database. The need for this particular vendor and data entry outsourcing was a quality assurance issue which ensured that all registration cards were entered into the SVRS prior to Election Day, this did not occur in the 2004 elections. A cost-benefit analysis should be undertaken to determine the true value added by a third party contractor compared to performing these same functions "in house" with City Election Commission staff.

The audit found that the third party vendor met the Election Commission's consistency standards for absentee ballot processing for the April 1, 2008 election.

#### Recommendation 8: Compare the cost of staff versus vendor data entry

The Election Commission should analyze the costs and benefits of the outsourcing of data entry compared to performing those functions with City Election Commission staff.

#### F. Assisted Living Center Ballots

The procedures for absentee ballot voting at assisted living centers are similar to the procedures for in-person absentee voting, in that each resident submits a voter registration application and also completes a request for an absentee ballot.

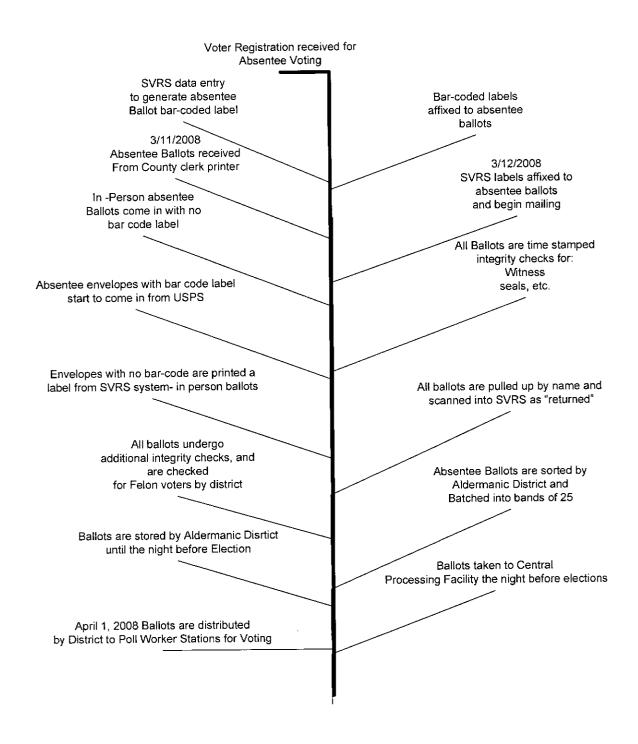
There are three teams of Special Registration Deputies or Nursing Home Deputies, made up of two members each. These Special Registration Deputies are provided with a copy of the State Elections Board's Absentee Voting in Nursing Homes, Qualified Retirement Homes and Community-Based Residential Facilities prior to any site visits to assisted living centers.

Prior to each election, the Election Commission mails a list of registered and absentee ballot voters to facilities in the City of Milwaukee. Staff from these facilities examine the voter lists and notify the Election Commission of any changes. Approximately two weeks prior to the election, the Nursing Home Deputies schedule two designated times at each assisted living facility to distribute ballots for all residents that have filed the proper applications.

The actual voting occurs in a common area of the facilities during these site visits. Nursing Home Deputies are available at that time to provide assistance in completing the ballot and sealing it in the absentee ballot envelope. Both Nursing Home Deputies sign as witnessed on each voter's absentee ballot envelope. As of the April 1, 2008 election, ballots cast at assisted living centers are processed at the central processing facility as these ballots are considered to be in-person absentee ballots.

The audit reviewed over 400 "offsite" ballots from assisted living facilities and found no ballot processing errors. The audit also found that no unauthorized persons were found to have come into contact or take custody of the absentee ballots at the offsite facilities. The ballots were delivered to the Election Commission's office by Election Commission staff and were secured until Election Day. Tax record checks confirmed all of the properties visited were in fact residential assisted living facilities.

#### **Absentee Ballot Processing Timeline**



#### Absentee Ballot Envelope – Business Reply Mail pg. 1





# THIS ENVELOPE TO BE USED BY VOTER FOR RETURN OF MARKED BALLOT TO THE CITY OF MILWAUKEE ELECTION COMMISSION. OFFICIAL BALLOTING MATERIAL - FIRST CLASS MAIL

## FIRST-CLASS MAIL PERMIT NO. 8344 MILWAUKEE, WI **BUSINESS REPLY MAIL**

POSTAGE WILL BE PAID BY ADDRESSEE

BOARD OF ELECTION COMMISSIONERS

CITY HALL — ROOM 501 200 E. WELLS STREET MILWAUKEE, WI 53202-9666

Hammallandhamallan

#### Absentee Ballot Envelope pg. 2 – Voter Certification

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

(Name and Complete Address)

## ABSENTEE CERTIFICATE

Voter: Complete the information below and sign the certification in the presence of a witness who must also sign.

	Name (Last, First, Middle) including suffix  Street Address - include street number or fire number and name of street, or rural route and box number  City, State, Zip
	ity, State, Zip
and (Lab), first, madein, accounts of the number and name of street, or rural route and box number	

## CERTIFICATION OF VOTER

other person marked the ballot and enclosed and sealed the ballot in this envelope in a manner that no one but myself and any person providing assistance under s.6.87(5), Wis. Stats., if I requested assistance, could know how I voted. certify, subject to the penalties of s.12.60(1)(b), Wis. Stats., for false statements, that I am a resident of the ward of the municipality in the county of the state of Wisconsin indicated above, and am entitled to vote in the ward at the election indicated above; that I am not voting at any other location in this election; that I am have changed my residence within the state from one ward to another within 10 days before the election. I certify that I exhibited the enclosed ballot, unmarked, to the witness, that I then in the presence of the witness and in the presence of no unable or unwilling to appear at the polling place in the ward on election day, or I

## Signature of Voter

FB-122 (Kev. 9/2007) The information on this form is required by Se.6.22(2)(b), 6.24(7), and 6.87(2), Wis. Stats.

#### Citizen and that the above statements are true and the voting procedure was executed as stated. I am not a candidate for any office on the enclosed ballot (except in the case of an incumbent municipal clerk). I did not solicit or advise the elector to vote for or against any statements, certify that I am an adult U.S. candidate or measure.

I, the undersigned witness, subject to the penalties of s.12.60(1)(b), Wis. Stats., for false

CERTIFICATION OF WITNESS

### Signature of Witness (who is an adult U.S. Citizen)

Address of Witness (Include street number or fire number is street, or rural route and box number, mu ality, s. and zip code)



**Board of Election Commissioners** 

Commissioners
Allen E. Campos
Robert F. Spindell, Jr.
Victoria L. Toliver
Executive Director
Susan M. Edman

October 7, 2008

W. Martin Mories Comptroller 200 East Wells Street Room 404 Milwaukee, WI 53202

Dear Mr. Morics.

Thank you for the opportunity to respond to the results of the audit conducted by your staff of the Election Commission's Processing of Absentee Ballots. The audit included a review of the Election Commission's second attempt at the central processing of absentee ballots since state law was changed in 2006 (2005 Wisconsin Act 451). Since this audit, the Election Commission has processed absentee ballots in the Fall Primary Election and is currently making preparations for the November 4<sup>th</sup> Presidential Election. Most of the recommendations made in this audit will be in effect for the November 4<sup>th</sup> Presidential Election.

#### Recommendation 1: Ensure absentee ballot requests turnaround time follows statutory requirements.

The Election Commission receives requests for absentee ballots throughout the year for future elections. These requests are immediately entered into the Statewide Voter Registration System (SVRS). Requests for absentee ballots are processed as soon as ballots are delivered. Wis. Stats. 7.10 (3) describes the time schedule by which ballots must be delivered to the municipal clerks. The Election Commission works closely with the Milwaukee County Election Commission to ensure delivery of ballots at the earliest possible date.

#### Recommendation 2: Further control access to absentee ballots.

The Election Commission contracted with a third party vendor for the data entry of all voter registration applications as well as all absentee ballot request applications. Due to the volume of activity, they have also assisted with the scanning of all absentee ballots upon return (via the U.S. Postal Service) to the Election Commission. Due to a shortage of available computers, absentee ballots were taken to the computer training room in the basement of City Hall for scanning. In the future, ballots will remain in the Election Commission. Other data entry activities will relocate to the computer training room.

#### Recommendation 3: Revise SOPs to reflect third-party vendor.

Standard operating procedures will be revised to reflect the use of a third-party vendor.

#### Recommendation 4: Cross train staff and assign where needed.

The audit recommends that election workers be rotated to different districts to increase the overall capabilities of election workers. Since the only difference is volume of work, the Election Commission now balances the workload by splitting those districts with the largest number of ballots. Rather than having a single team process all ballots from a single district, two (2) teams will share the workload.

#### Recommendation 5: Store personal bags away from ballots.

Election workers were allowed to keep their personal bags at their work station. Workers will now be required to keep their personal bags in a locked room.

#### Recommendation 6: Improve warehouse security.

The Election Commission will not be using the Municipal Warehouse after it relocates to a new facility in 2009. A different site has been secured for the November 4<sup>th</sup> Presidential Election which will be more conducive to implementing security procedures.

#### Recommendation 7: Train special election deputies.

All personnel will be required to attend a training session prior to participating in the central processing of absentee ballots. All new workers will be assigned to work with someone who has previous experience in processing absentee ballots.

#### Recommendation 8: Compare the cost of staff versus vendor data entry.

The Election Commission outsourced the data entry of all voter registration applications and absentee ballot request applications in 2008 to handle the sheer volume of activity that was anticipated and to prevent a repeat of the 2004 Presidential Election. Since January 1, 2008, the Election Commission has received close to 100,000 voter registration applications. Every voter application has been processed in a timely fashion and in accordance with state law thus allowing the Election Commission to print poll books without delay. If the outsourcing of data entry occurs in the future, it would only occur every fourth year to handle the demands of the Spring Presidential Primary and the Presidential Election.

The Election Commission is committed to conducting open, fair and efficient elections. To that end, we welcome the input of our constituents, elected officials and our community partners. Thank you for your recommendations.

Sincerely,

Susan M. Edman Executive Director